



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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January 19, 2016

**BY E.C.F.**

Honorable Ramon E. Reyes, Jr.  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Elise Bookman v. City of New York et al.,  
15 CV 03448 (WFK)(RER)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendant City of New York in the above-referenced matter. Defendant writes to respectfully request that the Court stay discovery in abeyance pending the outcome of Defendant's anticipated motion to dismiss. Earlier today, Defendant submitted a letter to the Honorable Judge Kuntz, II requesting a pre-motion conference to discuss its intention to file a motion to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(c). (Docket Entry No. 15). This motion is fully dispositive as to Plaintiff's claims against the City of New York, the only named defendant in this matter. Accordingly, Defendant respectfully requests that the Court stay discovery this matter pending the outcome of Defendant's motion. Defendant City thanks the Court for its time and consideration of this request.

Respectfully submitted,

/s/

Suvarna Sampale  
*Senior Counsel*  
Special Federal Litigation Division

cc: **BY E.C.F.**

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